

**TIFFANY & BOSCO, P.A.**

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JPMorgan Chase Bank, National Association  
17-72652

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:

Ovidiu Remus Ene

Debtors.

No. 17-14384-mkn

Chapter 13

Date: December 3, 2017  
Time: 1:30 p.m.

**OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

JPMorgan Chase Bank, National Association, Secured Creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objection to that certain Chapter 13 Plan proposed by the Debtors:

This objecting secured creditor holds the first Deed of Trust on the subject property generally described as 6635 W Oquendo Road, Las Vegas, NV 89118. As of August 10, 2017, the amount in default was approximately \$14,628.94, pursuant to the forthcoming proof of claim to be filed by JPMorgan Chase Bank, National Association. The Debtors' Chapter 13 Plan lists the arrearage owing to Secured Creditor as \$0.00. Secured creditor requests that the arrearages as will be set forth in the Proof of Claim be filed through the Plan.

1 Any Chapter 13 Plan proposed by the Debtors must provide for and eliminate of the Objections  
2 specified above in order to be feasible and to provide adequate protection to this Secured Creditor.

3 It is respectfully requested that Confirmation of the Chapter 13 Plan as proposed by the Debtors be  
4 denied.

5 WHEREFORE, Secured Creditor prays as follows:

- 6 1. That confirmation of the proposed Chapter 13 Plan be denied;
- 7 2. For attorney's fees and costs incurred herein;
- 8 3. For such other and further relief as this Court deems just and proper.

9  
10 DATED this 2 day of November, 2017.

11  
12 **TIFFANY & BOSCO, P.A.**

13 By /s/ Gregory L. Wilde  
14 **Gregory L. Wilde, Esq.**  
15 Attorney for Secured Creditor  
16 212 South Jones Boulevard  
17 Las Vegas, NV 89107  
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**CERTIFICATE OF MAILING OF OBJECTION TO  
CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

1. On 11/2/17 I served the following documents:

**OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

2. I caused to be served the above-named document by the following means to the persons as listed below:

**X a. ECF System**

Roger P. Croteau  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
Attorney for Debtors

Kathleen A. Leavitt

courtsecf3@las13.com  
Trustee

**X b. United States mail, postage fully prepaid:**

Ovidiu Remus Ene  
5840 Red Rock Street  
Las Vegas, NV 89118  
Debtors

**I declare under penalty of perjury the foregoing is true and correct.**

DATED this 2nd day of November, 2017.

By: /s/ Brad Anderson